

The Examiner also rejected Applicant's claims 11-14 under 35 U.S.C. §102(b) as being anticipated by the Castleberry reference. Claims 12 and 13 were rejected under 35 U.S.C. §103(a) as being unpatentable over the Castleberry reference. For the reasons set forth below, it is believed that new claims 15-18 patentably distinguish over the Castleberry reference.

Applicant's new independent claim 15 defines an apparatus that includes an array of pixel cells for a light valve. As recited in new claim 15, the array of pixel cells is arranged in a checkerboard pattern having a first set of squares that alternates with a second set of squares such that pixel cells in the first set of squares are diagonally adjacent pixel cells in the second set of squares. As further recited in new claim 15, and with reference to Applicant's Fig. 4CA, diagonally adjacent pixel cells in the pixel cell array have a gap Z formed therebetween. The gap Z includes a first edge defined by a pixel cell from first set of squares and a second edge defined by a pixel cell from second set of squares. Further in accordance with claim 15, the first edge and the second edge are parallel.

Applicant's specification defines certain advantages that result from the above-defined gap Z structure. For example, beginning at page 13, line 27, of Applicant's specification, it is discussed that the reduced inter-pixel spacing of the array permitted by this gap Z configuration in turn permits fabrication of pixel cell arrays having a greater density of pixel cells and, thus, enhanced image resolution. Further, beginning at page 10, line 24, of Applicant's specification, exclusion of corners by creating a gap Z between adjacent diagonally-situated pixel cells, prevents electrical contact between the tips of the diagonally-situated electrodes, thereby ensuring adequate inter-pixel isolation.

Upon review the Castleberry reference, Applicant submits that the reference neither teaches nor suggests the gap Z structure defined by Applicant's new claim 15. Rather, the Castleberry reference shows in its drawings, e.g. Fig. 4D, a dielectric structure formed between diagonally-adjacent pixel cells, but the structure lacking in the parallel edges defined by Applicant's new claim 15. A careful review of the text of the specification of the Castleberry reference fails to identify any discussion of the relationship between the edges of diagonally-adjacent pixel cells in the Castleberry pixel array.

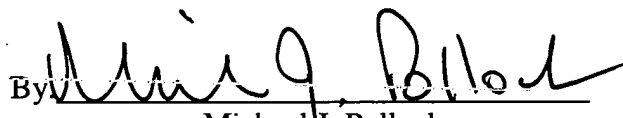
For the reasons set forth above, Applicant believes the new claims 15-18 patentably distinguish over the prior art. Therefore, it is requested that this application be passed to allowance.

Respectfully submitted,

STALLMAN & POLLOCK LLP

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By

A handwritten signature in black ink, appearing to read "Michael J. Pollock", written over a horizontal line.

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